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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	Case No. 3:05-cr-00108-2 (JWS)
	)	
Plaintiff,	)	
	)	PROPOSED VOIR DIRE
vs.	)	
	)	
SHANNON RAINEY,	)	
	)	
Defendant.	)	

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The United States requests that in addition to the standard questions this Court posits to the trial venire, this Court ask the following additional questions:

1. There may have been a certain amount of news coverage concerning this matter. Has anyone formed an opinion concerning the defendant's guilt or innocence based upon what they may have heard or seen in the various news media?

2. Have any of you been closely associated with anyone who has been subject to legal action or has been prosecuted for an offense involving illegal drugs or money laundering?

a. If so, what is your relationship with that person or persons?

b. What was the disposition of the case?

c. Do you think that the disposition was fair and proper?

3. The defendant is charged with offenses related to drug trafficking. Is there anything about the nature of the charges that would not permit you to sit on a jury and be fair and impartial to both the defendant and the United States? Have you formed any firmly held opinions about drug trafficking laws that would cause you to be unfair to any of the parties?

4. Do you have any firmly held beliefs about law enforcement officers that would cause you to favor one side of this case over the other? If so, would that opinion affect your deliberations as a juror in this case?

5. Have you or any member of your family or friends ever experienced what you consider unfair treatment by a law enforcement officer? If so, would such an experience in any way affect your deliberations as a juror in this case?

6. Have you or any close friend or relative been arrested for or been a victim of a crime within the last ten (10) years? If so, would such an experience make it difficult for you to sit as a fair and impartial juror to consider the issues in this case?

7. Have you, or any of your relations by blood or marriage, or any of your close personal friends been party to a dispute or legal action with the United States government or any of its officers, agents, or employees, or had any interest in such dispute or legal action?

8. Do any of you suffer from any type of physical condition or ailment that would make it extremely difficult or inconvenient as a juror to sit in consideration of this case?

9. Is there any other reason which may not have been touched upon by the court in its questions to you which affect your ability to sit as a fair and impartial juror for each side in this case?

The United States anticipates the defense will seek to inquire about any of the jurors' opinions or experience with domestic violence. The United States requests the opportunity to conduct individual voir dire of any prospective juror on this issue.

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The United States further requests the opportunity to conduct a limited amount of independent voir dire of the venire.

RESPECTFULLY SUBMITTED this day, August 22, 2006, in Anchorage,  
Alaska.

DEBORAH M. SMITH  
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s/Stephan A. Collins  
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CERTIFICATE OF SERVICE

I declare under penalty of perjury  
that a true and correct copy of the  
foregoing was sent to the following counsel  
of record on August 22, 2006, via:

(X) Electronic Filing Notice

Scott Dattan  
2600 Denali Street, Ste. 460  
Anchorage, Alaska 99503

S/ Stephan A. Collins